

GIBSON, DUNN & CRUTCHER LLP  
THEANE EVANGELIS, SBN 243570  
tevangelis@gibsondunn.com  
MICHAEL HOLECEK, SBN 281034  
mholecek@gibsondunn.com  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

JOSHUA S. LIPSHUTZ, SBN 242557  
jlipshutz@gibsondunn.com  
AUSTIN V. SCHWING, SBN 211696  
aschwing@gibsondunn.com  
PETER C. SQUERI, SBN 286249  
psqueri@gibsondunn.com  
555 Mission Street, Suite 3000  
San Francisco, CA 94105-0921  
Telephone: 415.393.8200  
Facsimile: 415.393.8306

LITTLER MENDELSON, P.C.  
ANDREW M. SPURCHISE, SBN 245998  
aspurchise@littler.com  
SOPHIA BEHNIA, SBN 289318  
sbehnia@littler.com  
333 Bush Street, 34th Floor  
San Francisco, CA 94105  
Telephone: 415.433.1940  
Facsimile: 415.399.8940

Attorneys for Defendant DOORDASH, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MANUEL MAGANA, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

DOORDASH, INC.,

Defendant.

CASE NO.

**DECLARATION OF CODY AUGHNEY IN  
SUPPORT OF DEFENDANT DOORDASH,  
INC.'S NOTICE OF REMOVAL**

Action Filed: May 8, 2018

1 I, Cody Aughney, declare as follows:

2 1. I am an adult over the age of 18 and a resident of the state of California. The  
3 information set forth herein is true and correct of my own personal knowledge (unless otherwise  
4 stated) and if asked to testify thereto, I would do so competently.

5 2. I am currently employed as Director Supply Operations for DoorDash, Inc.  
6 (“DoorDash”). In that role, I am knowledgeable of contractor-facing aspects of DoorDash’s  
7 business, and I have personal knowledge of DoorDash’s business model and operating systems. I  
8 have been employed by DoorDash since 2016.

9 3. I make this declaration in support of Defendant DoorDash’s Notice of Removal of  
10 Action to Federal Court. I am authorized to make these statements on behalf of DoorDash. In my  
11 role at DoorDash, I have access to and personal knowledge of the matters and information set forth in  
12 this declaration, and if called upon to testify thereto, could and would competently do so. The data  
13 from which the information set forth in this declaration was determined is maintained in the regular  
14 course of DoorDash’s business.

15 4. Individuals who contract with DoorDash to perform deliveries through the DoorDash  
16 platform (“Dashers” or “contractors”) are not geographically limited to work only in the state in  
17 which they first sign up to be a contractor. Thus, a Dasher could sign up in California and then use  
18 the DoorDash app to perform deliveries in other states like Nevada, Oregon, Arizona, or any other  
19 state.

20 5. Based on my review of company records, during the period of July 1, 2017 to May 31,  
21 2018, there are far more than 10,000 Dashers who performed at least one delivery in California using  
22 the DoorDash online platform.

23 6. Based on my review of company records, during the period of July 1, 2017 to May 31,  
24 2018, the aggregate number of miles driven by Dashers in California as part of their delivery  
25 services, including miles driven to each restaurant to pick up orders and the miles driven from the  
26 restaurant to the drop-off location, far exceeds 10 million miles.

27 7. I have included approximate or “at least” numbers within this declaration because  
28 DoorDash views its data as highly confidential and competitively sensitive.

1 I declare under penalty of perjury pursuant to the laws of the United States of America and the  
2 State of California that the foregoing is true and correct.

3 Executed at San Francisco, California, on this 8th day of June, 2018.  
4

5  
6   
Cody Aughney